

Advocates for Workplace Fairness

February 8, 2016

By CM/ECF

The Honorable George B. Daniels United States District Court Southern District of New York 500 Pearl St. New York, NY 10007

Re: Reiburn et al. v. Merrill Lynch & Co., Inc. et al., No. 15 Civ. 2960 (GBD)(JCF)

Blum et al v. Merrill Lynch & Co., Inc. et al, No. 15 Civ. 1636 (GBD)(JCF)

Dear Judge Daniels:

We represent the Plaintiffs in the above-referenced matters. We write jointly with Defendants to inform the Court that, after a third mediation with David Rotman, in San Francisco, California on January 28, 2016, the parties have an agreement in principal to resolve both of these cases. The parties will now memorialize their agreement in a formal settlement agreement and submit it to the Court along with a motion for settlement approval. Plaintiffs respectfully request that the Court permit them to file their settlement approval motion on or before February 29, 2016.

Respectfully submitted,

/s/ Justin M. Swartz

Justin M. Swartz

cc: all counsel of record by CM/ECF